

**From:** "D.Higgins" <dhiggins@cefcu.com> on 01/29/2004 04:50:20 PM  
**Subject:** Truth in Lending

Ms. Jennifer J. Johnson  
Secretary  
Board of Governors of the  
Federal Reserve System  
20th Street and Constitution Avenue, NW  
Washington, DC 20551

Dear Ms. Johnson:

Citizens Equity First Credit Union ("**CEFCU**") appreciates the opportunity to comment on the proposed revisions to Regulation Z, the Truth in Lending Act (TILA), Regulation B, the Equal Credit Opportunity Act (ECOA), Regulation E, the Electronic Fund Transfers Act (EFTA), Regulation M, the Consumer Leasing Act (CLA), and Regulation DD, the Truth in Savings Act. The proposed revisions would primarily revise the standard for providing "clear and conspicuous" disclosures that would be uniform among these regulations. The standard that would be adopted would be the one currently included in the rules adopted by the financial institution regulators in 2000 with regard to the annual privacy notices that must be sent by financial institutions.

#### **Summary of CEFCU's Position**

- CEFCU does not support the proposed revisions that would revise the standard for providing "clear and conspicuous" disclosures so that it would be uniform among these regulations and would be consistent with the standard currently included in the rules adopted by the financial institution regulators in 2000 with regard to annual privacy notices. The federal regulators are now considering amending the rules with regard to privacy notices. We do not believe that disclosure requirements with regard to Regulations Z, B, E, M, and DD should conform to a standard that may be subject to change.
- The information required to be disclosed under Regulations Z, B, E, M, and DD is different and more technical than the information contained in the privacy notices, and it would be difficult to disclose this information in the same format. The proposal may actually result in longer disclosures, which would not be consistent with "clear and conspicuous."
- The compliance burden of reviewing, redesigning, and reissuing disclosures will outweigh the benefits for consumers.
- If the proposal moves forward, the Board should also revise the model forms, notices, and clauses and then resubmit the proposal for additional public comment. The Board should also allow an implementation period of at least 18 months before compliance is required.

Thank you for the opportunity to comment on the proposed revisions to Regulations Z,

B, E, M, and DD.

Doug Higgins, Compliance Manager, CEFCU